

Pro Se 15 (Rev. 12/16) Complaint for Violation of Civil Rights (Non-Prisoner)

# UNITED STATES DISTRICT COURT

for the

Southern District of GEORGIA

Civil Rights Division

U.S. DISTRICT COURT  
SOUTHERN DIST. OF GA.

2020 SEP -1 AM 10:16

CLERK *gls*  
SO. DIST. OF GA.

Pamela Swain

Case No.

**CV-620 082**

(to be filled in by the Clerk's Office)

**Plaintiff(s)**

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Harvey Weinstein; The Weinstein Company; Alan Dershowitz; Anthony Robbins; Kiwifarms Social Media site

**Defendant(s)**

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)

## COMPLAINT FOR VIOLATION OF CIVIL RIGHTS (Non-Prisoner Complaint)

### NOTICE

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed in forma pauperis.

**I. The Parties to This Complaint****A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Pamela D Swain		
Address	1553 Community Rd		
	Glennville	GA	30427
	<i>City</i>	<i>State</i>	<i>Zip Code</i>
County	Tattnall		
Telephone Number	470-571-5856		
E-Mail Address	Pamela_swain@yahoo.com		

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

**Defendant No. 1**

Name	Harvey Weinstien		
Job or Title <i>(if known)</i>	Convicted Rapist		
Address	3040 Wende Rd		
	Alden	NY	14004
	<i>City</i>	<i>State</i>	<i>Zip Code</i>
County	Erie		
Telephone Number	716-937-4000		
E-Mail Address <i>(if known)</i>			

☒ Individual capacity    ☐ Official capacity

**Defendant No. 2**

Name	The Former Weinstein Company		
Job or Title <i>(if known)</i>			
Address	99 Hudson Street		
	New York city	NY	10014
	<i>City</i>	<i>State</i>	<i>Zip Code</i>
County	New York		
Telephone Number	1-212-845-8600		
E-Mail Address <i>(if known)</i>			

☐ Individual capacity    ☐ Official capacity

## Defendant No. 3

Name Anthony Robbins

Job or Title (if known) Self-Employed

Address 9051 Mira Mesa Blvd PO Box 261229

San Diego CA 92196

*City State Zip Code*

County San Diego County

Telephone Number \_\_\_\_\_

E-Mail Address (if known) \_\_\_\_\_

☒ Individual capacity ☐ Official capacity

## Defendant No. 4

Name Alan Dershowitz

Job or Title (if known) retired lawyer under criminal investigation

Address \_\_\_\_\_

Boca Raton FL \_\_\_\_\_

*City State Zip Code*

County \_\_\_\_\_

Telephone Number \_\_\_\_\_

E-Mail Address (if known) \_\_\_\_\_

☒ Individual capacity ☐ Official capacity

## II. Basis for Jurisdiction

Under 42 U.S.C. § 1983, you may sue state or local officials for the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against (check all that apply):

- ☐ Federal officials (a *Bivens* claim)
- ☐ State or local officials (a § 1983 claim)

B. Section 1983 allows claims alleging the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

Federal and state officials such as Judge Christopher Ray have knowingly allowed criminal harassment activities of Harvey Weinstein, The Former Weinstein Company, Anthony Robbins, and Alan Dershowitz. The crooked judge refuses to let me have my day in court proving these men harass me with the evidence I have.

C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

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- D. Section 1983 allows defendants to be found liable only when they have acted “under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia.” 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.
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### III. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

- A. Where did the events giving rise to your claim(s) occur?

The events began in 2014 when Harvey Weinstein and Tony Robbins hacked my personal yahoo accounts and then sending me messages that would become sexual, threatening, and of rape. They looked up my personal information and then proceeded to have me fired from almost all my work, created contraband fake nudes, and posted all my personal info online on a social media site, kiwifarms.

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- B. What date and approximate time did the events giving rise to your claim(s) occur?  
February 2014 to present.
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- C. What are the facts underlying your claim(s)? (*For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?*)  
Illegally targeted, hacked, threatened, harassed and exposed online. Mother threatened online and her information exposed.
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#### **IV. Injuries**

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

Loss of several jobs and income for over 6 years. As of recently, I am a federal employee of the Department of Commerce, US Census. And Weinstein continued his harassment online though that job. Documented and evidence available. This court let him go free and unaccountable for his criminal actions.

The plaintiff would also like a gag order placed on Weinstein and his lawyers.

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#### **V. Relief**

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

I want restraining orders on Harvey Weinstein, Alan Dershowitz, Anthony Robbins, and compensation for damages of 25 million.

**VI. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 08/06/2020

Signature of Plaintiff Pamela D Swain

Printed Name of Plaintiff Pamela D Swain


**B. For Attorneys**

Date of signing: \_\_\_\_\_

Signature of Attorney \_\_\_\_\_

Printed Name of Attorney \_\_\_\_\_

Bar Number \_\_\_\_\_

Name of Law Firm \_\_\_\_\_

Address \_\_\_\_\_

\_\_\_\_\_  
*City*

\_\_\_\_\_  
*State*

\_\_\_\_\_  
*Zip Code*

Telephone Number \_\_\_\_\_

E-mail Address \_\_\_\_\_

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